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7 | Attorneys for GOOGLE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

1 GOOGLE LLC,  
2 Plaintiff,  
3 vs.  
4 SONOS, INC.,  
5 Defendant

CASE NO. 3:20-cv-06754-WHA  
Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN  
SUPPORT OF SONOS, INC.'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED (DKT. NO. 158)**

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing  
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this  
 5 Declaration, and if called as a witness I would testify competently to those matters

6 2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to  
 7 Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. No.  
 8 158) filed in connection with Sonos’s Motion for Leave to File an Amended Answer (“Motion to  
 9 Amend”) (Dkt. No. 157). If called as a witness, I could and would testify competently to the  
 10 information contained herein.

11 3. Google seeks an order sealing the materials as listed below:

12 <b>Document</b>	13 <b>Portions Google Seeks to Be 14 Filed Under Seal</b>	15 <b>Designating Party</b>
16 Exhibit 1 to the Declaration 17 of Cole B. Richter in Support 18 of Sonos’s Motion to Amend 19 (“Exhibit 1”)	20 Portions highlighted in green	21 Google

22 4. I understand that the Court applies a “compelling reasons” standard to a sealing request  
 23 made in connection with an answer to a complaint. *See, e.g., VLSI Tech. LLC v. Intel Corp.*, No. 17-  
 24 CV-05671-BLF, 2021 WL 6063965, at \*1 (N.D. Cal. Dec. 22, 2021); *Delfino Green & Green v.*  
 25 *Workers Compensation Sols., LLC*, No. 15-CV-02302-HSG, 2015 WL 4235356, at \*2 (N.D. Cal. July  
 26 13, 2015).

27 5. The portions of Exhibit 1 highlighted in green on pages 13 and 14 contain references to  
 28 Google’s confidential business information and trade secrets, including details regarding the  
 architecture, technical operation, and work flow strategies and processes of Google’s products. The  
 specifics of how these functionalities operate and were developed is confidential information that  
 Google does not share publicly. Thus, I understand that the public disclosure of such information  
 could lead to competitive harm to Google as competitors could use these details regarding the  
 architecture and functionality of Google’s products to gain a competitive advantage in the marketplace  
 with respect to their competing products. A less restrictive alternative than sealing would not be

1 sufficient because the information sought to be sealed is Google's confidential business information  
2 and trade secrets but has been utilized by Sonos in support of Sonos's Motion to Amend.

3       6.       The portions of Exhibit 1 highlighted in green on pages 16, 19, 20, 21, and 31 also  
4 contain confidential information regarding the terms of business agreements and licensing  
5 negotiations that are not public. I understand that public disclosure of this information would harm  
6 Google's competitive standing and its ability to negotiate future agreements by giving competitors  
7 access to Google's highly confidential business thinking and asymmetrical information about  
8 Google's collaboration strategies to other entities. A less restrictive alternative than sealing the  
9 highlighted portions would not be sufficient because the information sought to be sealed is Google's  
10 proprietary and confidential business information but has been utilized by Sonos in support of Sonos's  
11 Motion to Amend.

12 I declare under penalty of perjury under the laws of the United States of America that to the  
13 best of my knowledge the foregoing is true and correct. Executed on March 20, 2022, in San  
14 Francisco, California.

15 | DATED: March 20, 2022

By: /s/ Jocelyn Ma  
Jocelyn Ma